

UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

CRIMINAL NO. 19-20429

v.

HON. DAVID M. LAWSON

ROBERT BERNARD GIGGIE,

Defendant.

_____ /

STIPULATION TO ADJOURN SENTENCING

Through their respective counsel, the parties stipulate and agree to adjourn the deadline for submitting factual and guideline errors to Probation, and the sentencing in this matter from October 21, 2019, and November 12, 2019, respectfully, for a period of at least thirty days. The government opposes adjournment of sentencing beyond December 20, 2019, given the amount of time that has already passed since this defendant's arrest. This delay is sought to permit the defense time necessary to better prepare for sentencing, and the government is aware of the extenuating circumstances relating to the defense counsel's schedule and availability that justify the requested adjournment.

The defendant, Robert Giggie, was arrested by complaint on October 1, 2018. He pleaded guilty to an information on August 13, 2019. He has been on pretrial release since his initial appearance on October 1. The adjournment sought

is the first delay of the sentencing date sought by the parties. Under the circumstances of this case, the parties agree that neither the government nor the defendant will be prejudiced by the requested delay.

So stipulated:

s/ Benjamin C. Coats

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s/ John Freeman (with consent)

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